IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA,)	
)	
v.)	
)	Case No. 3:22-CR-00282
GLEN CASADA and)	
CADE COTHREN,)	
)	
Defendants.)	

DEFENDANT CADE COTHREN'S UNOPPOSED MOTION TO EXTEND DEADLINE FOR MOTIONS REGARDING DISCOVERY ISSUES

Comes now Defendant Cade Cothren, by and through undersigned counsel, and hereby moves this Honorable Court for an Order extending the deadline for Mr. Cothren to file any motions regarding discovery issues for at least 30 days. In support, Mr. Cothren would show:

- 1. The deadline for Mr. Cothren to file any motions regarding discovery issues is July 17, 2023 (Doc. No. 49).
- 2. The government has provided Mr. Cothren with hard drive discovery production on two occasions—September 6, 2022 and December 8, 2022—as well as small productions on May 3, 2023 and May 5, 2023.
- 3. On May 5, 2023, undersigned counsel provided the government with a detailed letter requesting additional production and to conduct a physical evidence review.
- 4. On June 29, 2023, the parties conferred, and the government advised that more discovery documents were forthcoming.
- 5. On July 3, 2023, the government responded in a letter and indicated its intent to provide additional discovery to Mr. Cothren in the coming weeks. The government requested a one-terabyte hard drive for the first production in response to Mr. Cothren's May 5, 2023 discovery

requests and has said it may need hard drives of additional terabytes for the remaining discovery productions.

- 6. The government has advised undersigned counsel that the government intended to provide the first production in response to Mr. Cothren's discovery requests to undersigned counsel the week of July 10, 2023, and to provide remaining data shortly thereafter.
- 7. Undersigned counsel will need sufficient time to review the anticipated supplemental discovery productions and determine if any motions regarding discovery issues are necessary.
- 8. Undersigned counsel has conferred with Assistant United States Attorney Amanda Klopf who states that the government does not oppose Mr. Cothren's Motion to extend the deadline for 30 days.
- 9. Mr. Cothren reserves the right to request further extensions of upcoming deadlines based on the timing and volume of the government's forthcoming supplemental document productions.

For all the above reasons, Mr. Cothren respectfully requests this Court enter an Order extending the deadline for Mr. Cothren to file any motions regarding discovery issues from July 17, 2023 to a date not earlier than August 17, 2023.

Respectfully Submitted,

Sherwood Boutique Litigation, PLC

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on the following via the Court's CM/ECF system to:

Amanda J. Klopf, Esq. Assistant United States Attorney 719 Church Street, Suite 3300 Nashville, TN 37203 Amanda.Klopf@usdoj.gov

John P. Taddei, Esq. Trial Attorney Public Integrity Section, Criminal Division U.S. Department of Justice 1301 New York Ave., NW Washington, DC 20530 john.taddei@usdoj.gov

on this the 14th day of July 2023.

/s/ Cynthia A. Sherwood